

Exhibit A

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THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

**CASE NO.: 2:23-cv-01495-JHC
STIPULATION REGARDING
DISCOVERY OF
ELECTRONICALLY STORED
INFORMATION AND
[PROPOSED] ORDER**

Plaintiffs Federal Trade Commission and the states of New York, Connecticut, New Hampshire, Oklahoma, Pennsylvania, Delaware, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New Mexico, Oregon, Rhode Island, and Wisconsin, acting by and through their respective Attorneys General (“Plaintiff States,” and together with the Federal Trade Commission, “Plaintiffs”) and Defendant Amazon.com, Inc. (“Amazon” or “Defendant”) (together, the “Parties”) hereby stipulate to the following provisions regarding discovery of electronically stored information (“ESI”) in this matter:

A. General Principles

1. An attorney’s zealous representation of a client is not compromised by conducting discovery in a cooperative manner. The failure of counsel or the Parties to litigation to cooperate

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1 in facilitating and reasonably limiting discovery requests and responses raises litigation costs and
2 contributes to the risk of sanctions.

3 2. As provided in LCR 26(f), the proportionality standard set forth in Fed. R. Civ. P.
4 26(b)(1) must be applied in each case when formulating a discovery plan. To further the
5 application of the proportionality standard in discovery, requests for production of ESI and related
6 responses should be reasonably targeted, clear, and as specific as possible.

7 **B. ESI Disclosures**

8 Within 10 days after written responses to discovery requests made under Fed. R. Civ. P.
9 34 are served, but no earlier than 14 days after entry of this Order, the responding party shall
10 disclose:

11 1. Custodians. An initial list of proposed custodians within its organization (past or
12 present) likely to possess responsive ESI, as well as the potential custodians' job titles, tenure,
13 and a brief summary of their primary responsibilities. The requesting party may identify any
14 additional custodians it believes should be included. The parties will meet and confer about any
15 disputed custodians promptly and in good faith.

16 2. Non-custodial Data Sources. A list of non-custodial data sources (e.g., shared
17 drives, servers), if any, likely to contain discoverable ESI.

18 3. Third-Party Data Sources. A list of third-party data sources, if any, likely to
19 contain discoverable ESI (e.g., third-party email providers, mobile device providers, cloud
20 storage) and, for each such source, the extent to which a party is (or is not) able to preserve
21 information stored in the third-party data source.

22 4. Inaccessible Data. A list of data sources, if any, likely to contain discoverable
23 ESI (by type, date, custodian, electronic system or other criteria sufficient to specifically

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1 identify the data source) that a party asserts is not reasonably accessible under Fed. R. Civ. P.
2 26(b)(2)(B).

3 5. Foreign data privacy laws. Nothing in this Order is intended to prevent any Party
4 from complying with the requirements of a foreign country's data privacy laws, e.g., the European
5 Union's General Data Protection Regulation (GDPR) (EU) 2016/679. The Parties agree to meet
6 and confer before including custodians or data sources subject to such laws in any ESI or other
7 discovery request.

8 **C. ESI Discovery Procedures**

9 1. On-site inspection of electronic media. Such an inspection shall not be required
10 absent a demonstration by the requesting party of specific need and good cause or by agreement
11 of the Parties.

12 2. Search methodology. The Parties shall timely confer to attempt to reach agreement
13 on appropriate search terms and queries, file type and date restrictions, data sources (including
14 custodians), and other appropriate computer- or technology-aided methodologies. The Parties may
15 propose modifications to the search terms proposed by any Party, and the Parties shall continue
16 to cooperate in revising the appropriateness of the search methodology.

17 a) The producing party shall disclose the data sources (including custodians),
18 search terms and queries, any file type and date restrictions, and the use of technology-assisted
19 review ("TAR"). The producing party shall provide unique hit counts for each search query.

20 b) After disclosure, the Parties will engage in a meet and confer process
21 regarding additional terms sought by the non-producing party.

22 c) The following provisions apply to search terms / queries of the requesting
23 party. Focused terms and queries should be employed; broad terms or queries, such as product

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1 and company names, generally should be avoided. A conjunctive combination of multiple words
2 or phrases (e.g., “computer” and “system”) narrows the search and shall count as a single search
3 term. A disjunctive combination of multiple words or phrases (e.g., “computer” or “system”)
4 broadens the search, and thus each word or phrase shall count as a separate search term unless
5 they are variants of the same word. The producing party may identify each search term or query
6 returning overbroad results demonstrating the overbroad results and a counter proposal correcting
7 the overbroad search or query.

8 d) If a party seeks to use TAR during its search methodology, it shall notify
9 the other Parties in the litigation of its intent to do so. At that time, the responding party shall
10 provide a description of its proposed TAR methodology. Following this notification, the Parties
11 will meet and confer regarding the TAR methodology.

12 3. Format.¹ ESI will be produced in the formats set out in Appendix A to this
13 stipulation. If particular ESI warrants a different format or method of production, the Parties may
14 request to produce that ESI in an alternative format or method of production than set out in
15
16
17

18
19 ¹ Documents that are not produced in the first instance in this litigation, *i.e.*, documents first
20 produced in the FTC’s investigation or in related cases, shall be produced in the format of
21 document productions in those other matters, provided that those re-productions are in a
22 reasonably useful format and provided that the producing party informs all other Parties, prior to
23 or at the time of production, that the production will be in a nonconforming format. The Parties
reserve the right to object to a nonconforming format and to make reasonable requests for the
production of such documents in a conforming format to the extent that such reproduction does
not impose an undue burden on the producing party. The parties agree that, in general, the
productions by Amazon in the FTC’s investigation or in related cases were made pursuant to the
respective parties’ agreements at the time and shall not be reproduced in different formats in this
litigation.

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Appendix A. In such case the Parties agree to cooperate in good faith to arrange for a mutually acceptable production format.

a) ESI will be produced to the requesting party with searchable text, in the format described in Appendix A.

b) Unless otherwise agreed to by the Parties, or required by a reasonable redaction process, files that are not easily converted to image format, such as spreadsheets, databases, and drawing files, will be produced in native format with extracted text and metadata. Unless otherwise agreed to by the Parties, for all other files, native files shall be produced upon reasonable request within 14 days.

c) Each document image file shall be named with a unique number (Bates Number). Bates numbers should not be more than thirty characters long or contain spaces.

d) If a document is more than one page, the unitization of the document and any attachments and/or affixed notes shall be maintained as they existed in the original document.

e) The Parties shall produce their information in the following format: single-page images and associated multi-page text files containing extracted text or with appropriate software load files containing all information required by the litigation support system used by the receiving party.

f) Unless otherwise agreed to by the Parties, the full text of each electronic document shall be extracted ("Extracted Text") and produced in a text file. The Extracted Text shall be provided in searchable ASCII text format (or Unicode text format if the text is in a foreign language) and shall be named with a unique Bates Number (*e.g.*, the unique Bates Number of the first page of the corresponding production version of the document followed by its file extension).

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4. De-duplication. The Parties may de-duplicate their ESI production across custodial and non-custodial data sources after disclosure to the requesting party, and the duplicate custodian information removed during the de-duplication process shall be tracked in a duplicate/other custodian field in the database load file.

5. Email Threading. Subject to Paragraph E(4) below, the Parties may use analytics technology to identify email threads and need only produce the unique most inclusive copy and related family members and may exclude lesser inclusive copies, except if the lesser inclusive copies include unique family members, in which case the lesser inclusive copies and related family members shall also be produced. Upon reasonable request, the producing party will produce a less inclusive copy.

6. Hard-Copy Documents. Hard-copy documents will be scanned using Optical Character Recognition technology and searchable ASCII text files will be produced (or Unicode text format if the text is in a foreign language), unless it will not result in accurate or reasonably useable/searchable ESI, like handwritten documents. Each file will be named with a unique Bates Number (*e.g.*, the unique Bates Number of the first page of the corresponding production version of the document followed by its file extension). These documents will be unitized following scanning into appropriate segments and custodial information will be provided in the load files.

D. Preservation of ESI

The Parties acknowledge that they have a common law obligation, as expressed in Fed. R. Civ. P. 37(e), to take reasonable and proportional steps to preserve discoverable information in the party's possession, custody, or control. With respect to preservation of ESI, the Parties agree as follows:

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1 1. Absent a showing of good cause by the requesting party, the Parties shall not be
2 required to modify the procedures used by them in the ordinary course of business to back-up and
3 archive data; provided, however, that the Parties shall take reasonable and proportional steps to
4 preserve all discoverable ESI in their possession, custody, or control.

5 2. The Parties agree that only unique, non-duplicative sources of discoverable
6 Documents need to be preserved.

7 3. Absent a showing of good cause by the requesting party, the categories of ESI that
8 need not be preserved include, but are not limited to:

- 9 a. Deleted, slack, fragmented, or other data only accessible by forensics.
- 10 b. Random access memory (RAM), temporary files, or other ephemeral data
11 that are difficult to preserve without disabling the operating system.
- 12 c. On-line access data such as temporary internet files, history, cache,
13 cookies, and the like.
- 14 d. Data in metadata fields that are frequently updated automatically, such as
15 last-opened dates (see also Section (E)(5)).
- 16 e. Interim automatically saved drafts.
- 17 f. Back-up data that are duplicative of data that are more accessible
18 elsewhere.
- 19 g. Server, system or network logs.
- 20 h. Data remaining from systems no longer in use that is unintelligible on the
21 systems in use.
- 22 i. Electronic data (*e.g.*, email, calendars, contact data, and notes) sent to or
23 from mobile devices (*e.g.*, iPhone, iPad, Android devices), provided that
24 a copy of all such electronic data is automatically saved in real time
elsewhere (such as on a server, laptop, desktop computer, or “cloud”
storage).

22 **E. Privilege**

23 1. The Parties will discuss in good faith the production of privilege logs.

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F. Non-Party Discovery

1. A party that issues a non-party subpoena (the “Issuing Party”) shall include a copy of this ESI Protocol with the subpoena.

2. The Issuing Party shall be responsible for producing any documents obtained under a subpoena to all other parties within 10 days. The Issuing Party shall not be responsible for the format of such production and shall produce the documents in the same format that they were produced by the non-party.

3. If the non-party production is not Bates-stamped, the Issuing Party shall endorse the non-party production with unique prefixes and Bates numbers prior to producing them to all other parties.

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Dated: XXX

Respectfully submitted,

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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED: _____

The Honorable John H. Chun
UNITED STATES DISTRICT JUDGE

APPENDIX A

PRODUCTION FORMAT PROTOCOL

A. Production Components.

1. A directory containing images of every page of every document in the production, Bates-numbered sequentially.
2. A directory containing native files for a subset of the documents, each file named with the Bates number of the first page of the document it represents and the confidentiality designation being used, with no additional text beyond this, and with the same extension as the original native file type of the document.
3. A directory containing OCR or Extracted Text files, one file per document, each file named with the Bates number of the first page of the document it represents with no additional text beyond this, followed by “.txt” suffix.
4. A Load File containing Bates ranges and Metadata for each document.

B. Production Format.

All documents shall be produced in the following formats when reasonably feasible:

1. Electronic Production of Paper Documents. Documents that are maintained in paper format shall be scanned as document level PDF files or black and white images at 300 x 300 dots per inch (DPI) or greater resolution, in single-page Group IV TIFF format, and shall reflect the full and complete information contained in the original document. Hard copy documents shall be produced with associated OCR files at the same time that the PDF or TIFF files are produced and with a Load File that includes at least the following Metadata fields: Begin Bates; End Bates; Begin Family; End Family; Pages; TextPath; Placeholder; File Extension; Custodian; All Custodians; Confidentiality; and Redacted, as those fields are described in Section IV, below. When subjecting physical documents to an OCR process, the settings of the OCR software shall maximize text quality over process speed. Any settings such as “auto-skewing” or “auto-rotation,” should be turned on when documents are run through the process. Paper documents that contain fixed notes shall be scanned with the notes affixed, if it can be done so in a manner so as not to obstruct other content on the document. If the content of the document is obscured by the affixed notes, the document and notes shall be scanned separately.
2. Production of Electronically Stored Information (ESI). Unless otherwise specified, document images shall be generated from electronic documents in a set of document level PDF or single page Group IV TIFF images that reflect the full and complete information contained on the original document. In the event a document is redacted, the producing party shall withhold the redacted text for that document. The failure to withhold such text for a redacted document by a producing party shall not be deemed a waiver of the privilege associated with that document.
3. File Structure. The producing party shall produce the following sets of files with each

production.

a. Load File.

- (1) Each production has one load file, in “Concordance” style .DAT format.
- (2) Values must be enclosed by þ (ASCII Decimal 254).
- (3) Values must be separated by the “Device Control 4” character, ASCII decimal 20.
- (4) First line must contain the column/field names (set forth in Section IV, below).
- (5) The fields Begin Bates and End Bates must be present, and the first fields listed in the load file.
- (6) The field NativePath must be present if native files are included in the document production.
- (7) Each subsequent row must contain the Metadata for one document.
- (8) Every row must have the same number of columns/fields (empty values are acceptable).
- (9) Text must be encoded in UTF-8.
- (10) File should be placed in the root directory or a directory labeled “DATA.”

b. OCR and Extracted Text Files (.TXT Files).

- (1) A single text file for each document containing all the document’s pages, in text.
- (2) Pages separated by form feed character (decimal 12, hex 0xC).
- (3) Filenames should be of the form: <Bates num>.txt, where <Batesnum> is the Bates number of the first page of the document.
- (4) Text must be encoded in UTF-8.
- (5) Files should be placed in a directory labeled “TEXT.”

c. Image Files.

- (1) Document level PDF or Single-page Group IV TIFF images for each document, containing all images for that document.
- (2) Filenames should be of the form: <Bates num>.<ext>, where <Bates num> is the BATES number of the first page of the document (i.e., the “Begin Bates” number), and <ext> is the appropriate extension for the image format (.pdf or .tiff).
- (3) Files should be placed in the “IMAGES” subdirectory.

4. Illegible Documents. If a produced document cannot be read because of apparent imaging or formatting problems or other issues relating to the collection or production of documents, the receiving party may request a re-production from the producing party. The parties shall meet and confer to discuss the nature of the issues and any obstacles to re-production.
5. Native Format Documents. The parties recognize that it may be appropriate for certain documents to be produced in native format, such as spreadsheets, engineering drawings, presentations or slides, and audio and video files. In all cases, unless there is no textual

content, an OCR or Extracted Text file shall be produced along with the native file. The receiving party may request that the producing party produce additional file types of electronic documents in native format where the converted image format distorts or causes the information to be improperly displayed, or for which there is no visual representation, such as audio files. Prior to producing any confidential information as defined in any applicable Protective Order entered herein in native format, the producing party and the receiving party shall meet and confer to establish additional procedures, to the extent necessary, for the protection of information contained in native files.

- a. Excel and Access Databases. To the extent that responsive documents exist in Excel or another database program, documents shall be produced in native format unless the document needs to be redacted. To the extent that the document format constitutes a database created or maintained in Access or another software program, documents shall be produced in their native format, where reasonably feasible. If a database is based upon proprietary software, the parties shall meet and confer regarding the format of production, which shall be a reasonably feasible format, to enable review by the receiving party. An image placeholder shall be provided for each document produced in native format. Each placeholder shall contain the phrase "DOCUMENT PRODUCED IN NATIVE FORMAT," or something similar, and shall contain the Bates number corresponding to the native file.
- b. PowerPoint Presentations (PPT). PPT presentations should be produced in native format (*e.g.*, as .PPT files). PPT presentations shall also be produced in full document PDF or single-page TIFF format, along with speaker notes. The linked native file name should also match the Begin Bates field with the appropriate file extension. Any hidden slides or speakers notes should be included in PPT presentations.
- c. Audio and Video Data. Parties should make best efforts to ensure care is taken for collection and production of any responsive audio and/or video data, and to preserve any Metadata that may be associated with those items. These data types may be stored in audio or video recordings, voicemail text messaging, and related/similar technologies.
- d. Word Documents (or similar). Microsoft Word documents (.DOC, .DOCX, or substantially similar non-Microsoft file formats) should be produced in full document PDF or single-page TIFF format for each document, containing all images for that document, and should be imaged in a manner that captures tracked changes and comments. To the extent a receiving party believes the converted image format distorts, omits, or causes information to be improperly displayed, the receiving party may request the document in native format and the producing party shall meet and confer to attempt to resolve the problem(s).
- e. To the extent the producing party produces a document in native format, the following specifications apply:

- (1) Filenames must be unique in the production, unless the content is identical. Files should be named for the starting Bates number of the associated document.
 - (2) The filename must retain the file extension corresponding to the original native format (*e.g.*, an Excel 2003 spreadsheet's extension must be .xls).
6. Color. A party that received a production may make reasonable requests that color images be produced for particular documents where color provides significant benefit to interpret the contents of the relevant documents. The production of documents/or ESI in color shall be made in single-page JPEG format (300 DPI). All requirements for productions stated in this ESI Agreement regarding productions in TIFF format apply to any productions of documents and/or ESI in color made in such an alternative format. Reasonable requests that a document be produced in color for the reasons set for in this Paragraph will not be unreasonably denied by the producing party. If a producing party wishes to object, it may do so by responding in writing and setting for its objection(s) to the production of the requested document in color.
7. Production Media. A producing party may produce documents electronically (via secure FTP, for example), or on an external hard drive, DVD, CD-ROM, or such other readily accessible computer or electronic media as the producing party and the receiving party may hereafter agree upon (the "Production Media"). Production Media should be labeled on its face with the production date, the production volume, the Bates range contained on the Production Media, and any confidentiality notation that may be required by the Protective Order entered in this case. Where not practicable to label Production Media on its face, a letter or email with the required information should be provided. If the producing party encrypts or "locks" the production, the producing party shall include, under separate cover, instructions regarding how to decrypt the files, and any necessary passwords.
8. Document Unitization. When scanning paper documents into document images as described in Section III.C.1., they shall be unitized in a manner so as to maintain the document(s) and any attachments as they existed in their original state, as reasonably feasible. Any applicable folder structure information should also be provided. Responsive attachments to e-mails stored shall be produced contemporaneously and sequentially immediately after the parent e-mail.
9. Duplicates. A producing party who has more than one identical copy of an electronic document (*i.e.*, the documents are actual duplicates) need only produce a single copy of that document. For avoidance of doubt, a producing party may de-duplicate actual duplicate documents across custodians, but all custodians should be identified in the All Custodians field.
10. Bates Numbering. Each producing party shall Bates number its production(s) as follows:

- a. Each Bates number should consist of a unique identifier consisting of a prefix, followed by nine numbers (*e.g.*, ABC000000001). The prefix should be substantially similar for all pages produced by the same producing party throughout this litigation. Each page of a document must have its own Bates number, and Bates numbers should be sequential.
 - b. Document Images. Each page of a produced document shall have a legible, unique page identifier (Bates number) electronically “burned” onto the image at a location that does not unreasonably obliterate, conceal, or interfere with any information from the source document. No other legend or stamp should be placed on the document other than a confidentiality designation (where applicable), a privilege designation, or a redaction notification (where applicable). For confidential documents the confidentiality designation shall be “burned” onto each document’s image at a location that does not unreasonably obliterate or obscure any information from the source document.
 - c. Native Format Documents. In order to preserve the integrity of any native format documents that will be produced, no Bates number, confidentiality legend or redaction information should be added to the content of the native format document. Each native should have an individual Bates number assigned.
11. Linked Files and Collaborative Work Environments. Producing parties will make reasonable efforts to identify hyperlinks to internal document repositories that are contained in responsive, non-privileged emails. Amazon’s “internal document repositories” will consist of [REDACTED]. Plaintiffs’ “internal document repositories” will consist of [REDACTED]. A producing party will provide a metadata overlay with its productions listing the hyperlinks found in each produced email. Upon a request from a receiving party, the producing party shall make reasonable efforts to retrieve the underlying documents for a reasonable number of specifically identified hyperlinks. In general, an attempt to programmatically retrieve the underlying documents based on the hyperlinks will constitute a reasonable effort. However, for particular documents, parties may request further efforts for good cause on a document-by-document basis. The producing party shall produce such underlying documents, with metadata connecting the underlying linked document to the hyperlink. But the parties acknowledge that links may be broken or otherwise unavailable for a wide range of reasons, often resulting in low retrieval rates. Moreover, the document retrieved may be the version that existed at the time of collection and not necessarily the version that existed at the time of the email containing the hyperlink. A producing party makes no representation that the recipient(s) of a hyperlink ever actually opened or viewed the hyperlinked document.

C. Metadata

For scanned hard copy documents, the producing party will provide the Metadata fields below:

FIELD NAME	FIELD DESCRIPTION
Begin Bates	The production Bates number associated with the first page of a

	document.
End Bates	The production Bates number associated with the last page of a document.
BeginFamily	Begin Bates number of first page of the parent Document of family of documents.
EndFamily	End Bates number of the last page of last attachment to a family of documents.
Pages	Total number of pages in the document.
TextPath	Link to text file for the document.
Placeholder	Whether a document has a placeholder image.
File Extension	The extension of the file.
Custodian	Identification of custodian(s) from whom the file was sourced.
All Custodians	Identification of all custodians of the document.
Confidentiality	Confidentiality designation assigned to the document.
Redacted	Whether a Document has redactions (Y/N).
Production Volume	Production volume number (<i>e.g.</i> , VOL001, VOL002, etc.).
Producing Party	Name of party producing the document.

For ESI and documents that were originally stored in electronic format, all fields below should be provided if required information is available. Unless otherwise agreed to by the parties, the field-naming conventions shall be as stated below, and shall be consistently applied across all productions:

FIELD NAME	FIELD DESCRIPTION
Begin Bates	The production Bates number associated with the first page of a document.
End Bates	The production Bates number associated with the last page of a document.
BeginFamily	Begin Bates number of first page of the parent document of family of attachments.
EndFamily	End Bates number of the last page of last attachment to a family of documents.
AttachCount	Number of document attachments.
AttachNames	Native file names of each individual attachment, separated by semicolons.
Custodian	Identification of the custodian(s) from whom the file was sourced.
All Custodians	Identification of all custodians who the producing party agreed to produce and where a duplicate of the document was de-duplicated when processing the documents.

FIELD NAME	FIELD DESCRIPTION
File Path	The file path from which the document was collected.
All Paths	Identification of all file paths for duplicate copies.
Author	Author field extracted from the Metadata of a document or other creator identified for the document
From	From field extracted from the Metadata of an email message.
To	To field extracted from the Metadata of an email message.
Cc	Cc field extracted from the Metadata of an email message.
Bcc	Bcc field extracted from the Metadata of an email message.
Pages	Total number of pages in the document.
Date Received	Datetime received (MM/DD/YYYY HH/MM/SS).
Date Sent	Datetime sent (MM/DD/YYYY HH/MM/SS).
Date Created	Datetime created (MM/DD/YYYY HH/MM/SS).
Date Modified	Datetime that a Document was last modified (MM/DD/YYYY HH/MM/SS).
Last Modified By	Identification of person(s) who last modified a document.
Message Id	Unique Message Id.
In Reply To	Message ID of email that instant email is in reply to.
Title	Title field value extracted from the Metadata of the Native File.
Subject	Subject line extracted from an email, e-document or e-attachment.
Filename	The full name of the Native File.
File Extension	The extension of the file.
File Size	The size of the file in bytes.
MD5 Hash	The MD5 hash value of a document.
Document Type	Document type.
Application	Name of the application used to open the file.
NativePath	The relative path to the native file for this document.
TextPath	The relative path to the text file for this document.
Redacted	Whether a document has redactions (Y/N).
Placeholder	Whether a document has a placeholder image.
Confidentiality	Level of confidentiality assigned.
Track Changes	Document has track changes (Y/N).
Hidden Content	Identifies documents with hidden content (<i>i.e.</i> , hidden rows, columns, sheets, or slides).
Speaker Notes	Document has speaker notes (Y/N).
Has Comments	Indicates there are comments in the document.
Production Volume	Production volume number (<i>e.g.</i> , V001, V002, etc.).

FIELD NAME	FIELD DESCRIPTION
Producing Party	Name of party producing the document.

The parties are not obligated to populate manually any of the fields identified above for either hard copy documents or ESI if such fields cannot be extracted from a document, with the exception of the following for each of hard copy documents and ESI: (a) Begin Bates, (b) End Bates, (c) BeginFamily (d) EndFamily, (e) Custodian, (f) All Custodians, (g) Confidentiality, (h) Redactions, (i) NativePath (for ESI), (k) TextPath, and any known Date information (Date Received, Date Sent, Date Created, and/or Date Modified).